

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(SOUTHERN DIVISION)**

**KARLA PATRICIA IRAHETA ET AL. \***

**Plaintiff**

**\* Civil Action No. 8:12-cv-01426-DKC**

**v.**

**\***

**LAM YUEN, LLC ET AL.**

**\***

**Defendants**

**\***

**\* \* \* \* \***

**DEFENDANT LAM YUEN, LLC'S ANSWERS TO PLAINTIFF IRAHETA'S  
INTERROGATORIES**

**TO:** Karla Patricia Iraheta, Plaintiff

**BY:** Lam Yuen, LLC, Defendant

COMES NOW THE Defendant Lam Yuen, LLC by and through its attorney Patrick Preller, Esq., and answers Plaintiff Karla Patricia Iraheta's Interrogatories in accordance with the Federal Rules of Procedure, and without waiving any rights that it may have to the admissibility or relevancy of any information contained or alluded to herein. The word usage and sentence structure is that of the attorneys and does not purport to be the exact language of the executing parties. The information supplied by these Responses is not based solely on the knowledge of the executing party, but includes knowledge of the party's agents, representatives, and unless privileged, attorneys.

**GENERAL OBJECTIONS**

1. Defendant objects to the Interrogatories to the extent that they seek information or documents protected from discovery by the attorney-client privilege, the attorney work-product doctrine, the joint defense privilege, or any other applicable privileges.
2. Defendant objects to the Interrogatories to the extent that they seek information and documents reflecting information that is private, confidential, a trade secret, confidential business information, proprietary information or other similar information.

3. Defendant Objects to the Interrogatories to the extent that they purport to impose discovery obligations beyond those imposed by the Federal Rules of Civil Procedure, the case law there under or this Court's Order.
4. Defendant Objects to the Interrogatories to the extent that they seek information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to these Interrogatories, he does not concede that the documents provided are relevant to this litigation.
5. Defendant objects to the Interrogatories to the extent that they are vague, ambiguous, overly broad, and/or unduly burdensome, and to the extent that they call for information and documents, which are equally available to Plaintiffs.
6. Defendant responds to the Interrogatories to the best of his present knowledge as of the date of this response. Defendant specifically reserves the right to supplement, modify or vary its responses at a later date and to present relevant information or documents at trial if it covers additional facts or documents in discovery an/or as a result of further investigation.
7. Defendant objects to the Interrogatories to the extent that they seek information and documents already produced or to the extent the Request seeks information or documents of impeachment.
8. Whenever, in response to the Interrogatories, Defendant agrees or has agreed to produce documents, this shall not constitute a representation that such documents exist. This response only signifies that the documents will be produced if they exist, can be located with reasonable diligence, and are not otherwise protected from disclosure.
9. These objections are incorporated by reference into each response below, and each response is made without waiving these objections, or any other specific objection made to the request.

### **ANSWERS TO INTERROGATORIES**

1. Identify each and every officer, director, and owner of Lam Yuen, LLC, including for each such individual their title/position, brief description, of his/her duties, the length of service, and for owners, percentage ownership

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Stan Lam-Owner Denis Lam-Registered Agent – as Lam Yuen, LLC Registered Agent and doing registered agent's responsibility duties**

2. Identify each and every employee of Lam Yuen, LLC that worked during Plaintiff's tenure of employment with Defendant, including for each such individual their full name, title/position, description of his/her duties, number of hours worked, gross pay per pay period, and under whose supervision worked.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not employ any other person, and the Plaintiff is not Lam Yuen, LLC's employee at all.**

3. Identify each and every person that you contend has knowledge of any facts relating to the allegations set forth in the Complaint, or your Answer and with regard to each:
- (a) Describe in detail the subject matter about which the person has knowledge, including each fact related to any of the allegations in the Complaint, or your Answer thereto, about which the person has knowledge, and
  - (b) Identify all documents in the person's possession which relate to his/her knowledge

**Denis Lam may have discoverable information (regarding Plaintiff's alleged employment) that contradicts Plaintiff's claims. No final decisions have been made as to trial witnesses, evidence or exhibits at this time.**

4. Identify all exhibits you intend to introduce at trial.

**Defendant objects to the Interrogatory to the extent that it seeks information or documents protected from discovery the by the attorney-client privilege, the attorney work-product doctrine, the joint defense privilege, or any other applicable privileges. Without waiving such objection, no final decisions have been made as to trial exhibits at this time. Plaintiff has sued the wrong entity. In the event Defendant Lam Yuen is still a Defendant at trial, all documents exchanged by the parties in discovery.**

5. Identify all persons whom you intend to call at trial as witnesses and describe the nature of their testimony.

**Defendant objects to the Interrogatory to the extent that it seeks information or documents protected from discovery the by the attorney-client privilege, the attorney work-product doctrine, the joint defense privilege, or any other applicable privileges. Without waiving such objection, no final decisions have been made as to witnesses at this time. Plaintiff has sued the wrong entity. In the event Defendant Lam Yuen is still a Defendant at trial, Defendant reserves the right to name any witness referred to or identified by the parties in discovery.**

6. Describe in detail any communications (oral or written) that you have had with any person (other than your attorneys), including the Plaintiff, about any of the facts alleged in the Complaint, or your Answer thereto. To "describe in detail" within the meaning of this interrogatory includes identification of the persons with whom you had the communication, the

date of the communication, the type of communication, and the substance of the communication.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Stan Lam and Denis Lam – verbal discussion of each of the complaint items when we have received the complaint by mail in May of 2012.**

7. Identify any persons whose statements you or your agents have obtained in connection with the matters alleged in the Complaint, or your Answer thereto.

**None at this time.**

8. Identify whether you have any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment and state the name of the insurance carrier, what claims are covered, and the limits of coverage.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not and does not have any such insurance agreements.**

9. Describe how employees, including, but not limited to the Plaintiff's time worked is: (a) scheduled; and (b) recorded.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, (a) and (b) Lam Yuen, LLC did not employ any other person.**

10. Identify the person(s) responsible for scheduling employees, including, but not limited to the Plaintiff's time worked.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this**

**litigation. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not employ any other person.**

11. Identify the person(s) responsible for verifying and recording the time worked for employees, including, but not limited to the Plaintiff's time worked.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not employ any other person.**

12. Identify the person(s) responsible for processing and distributing pay per each pay period, including the person(s) responsible for processing and distributing paystubs for employees, including but not limited to the Plaintiff.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not employ any other person.**

13. Identify the person(s) responsible for processing state, local, and federal payroll taxes on behalf of employees, including, but not limited to the Plaintiff.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not employ any other person.**

14. Describe the process for paying employees' overtime, if any, for all employees including, but not limited to the Plaintiff.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not employ any other person.**

15. If employees, including, but not limited to the Plaintiff, are responsible for recording their own time, please state so and describe the process that employees are to record their time worked.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not employ any other person.**

16. Please state the dates of each workweek in which the Plaintiff worked for the Defendant, beginning 3 years immediately prior to the commencement of the action, and further state for each such workweek:

- (a) The regular rate of pay;
- (b) The number of hours then worked;
- (c) The number of overtime hours worked; and
- (d) The gross and net wages received.

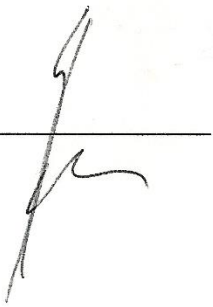
**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Notwithstanding these objections and without waiving same, (a), (b), (c), and (d) Lam Yuen, LLC did not employ any other person, and the Plaintiff did not work for Lam Yuen, LLC. The Plaintiff is not a Lam Yuen, LLC employee.**

17. Please identify any civil or criminal action, including but not limited to if you have ever filed for bankruptcy, in which you have been involved as either a plaintiff or defendant in a civil action, or the victim or witness in a criminal action. Your answer should include, but not be limited to case name, court in which the case was filed, a short description of the cause of action or offense and the outcome of the lawsuit.

**Defendant Objects to this interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. To the extent that Defendant responds to this Interrogatory, he does not concede that the information provided is relevant to this litigation. Defendant further objects to the form of the question. Notwithstanding these objections and without waiving same, Lam Yuen, LLC did not have any civil or criminal action and did not file any bankruptcy in the past.**

I affirm to the best of my present knowledge as of the date of this response that the foregoing is true to the best of my knowledge, information and belief.

By: Stan Lam  
Lam Yuen, LLC

A handwritten signature in black ink, appearing to be 'Stan Lam', is written over a horizontal line. The signature is stylized with a long, sweeping vertical stroke and a horizontal flourish at the end.

**KARLA PATRICIA IRAHETA ET AL. \***

**Plaintiff**

**\* Civil Action No. 8:12-cv-01426-DKC**

**v.**

**\***

**LAM YUEN, LLC ET AL.**

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**Defendants**

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**\* \* \* \* \***

**NOTICE OF SERVICE**

I HEREBY CERTIFY that on this \_\_\_\_\_ day of April, 2013, a copy of Defendant's Answers to Plaintiff Iraheta's Interrogatories were mailed, postage prepaid, to:

/s/ Jae Hwang

Jae S. Hwang, Federal Bar No. 17776

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*Attorney for Plaintiffs*

\_\_\_\_\_  
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